

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Filed: _____

CAMRON JAY ONEAL HENDRICKS,

INDEX NO. _____

Plaintiff,

Plaintiff designates Bronx
County as the place of trial.

-against-

S U M M O N S

NELSON E. PERDOMO and ABLN TRUCKING,

The basis of venue is
Plaintiff's residence:
3063 Grace Avenue
Bronx, New York

Defendants.

To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the plaintiff's attorneys within 20 days after the service of this summons, exclusive of the day of service of this summons, or within 30 days after service of this summons is complete if this summons is not personally delivered to you within the State of New York.

In case of your failure to answer this summons, a judgment by default will be taken against you for the relief demanded in the complaint, together with the costs of this action.

Dated: Forest Hills, New York
May 6, 2022


KRUPNIK LAW GROUP, P.C.
Attorneys for Plaintiff
108-18 Queens Blvd., Suite 704
Forest Hills, New York 11375
(718) 532-4400

TO: ABLN TRUCKING
121 Jaques Street
Elizabeth, New Jersey 07201

NELSON E. PERDOMO
121 Jaques Street
Elizabeth, New Jersey 07201-2725

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

CAMRON JAY ONEAL HENDRICKS,
Plaintiff,

INDEX NO.

VERIFIED COMPLAINT

-against-

NELSON E. PERDOMO and ABLN TRUCKING,
Defendants.

Plaintiff, by his attorneys, KRUPNIK LAW GROUP, P.C., as and for his Verified Complaint, respectfully alleges, upon information and belief:

1. The plaintiff, CAMRON JAY ONEAL HENDRICKS, at all times herein mentioned was and still is a resident of the County of Bronx and the State of New York.
2. The defendant ABLN TRUCKING, at all times herein mentioned, was and still is a corporation organized and existing under the laws of the State of New Jersey, with its principal place of business situated in the County of Nassau and the State of New York.
3. The defendant ABLN TRUCKING, at all times herein mentioned was and still is a foreign corporation duly licensed and authorized to do business in the State of New York.
4. The defendant, ABLN TRUCKING, at all times herein mentioned conducted and carried on business in the County of Nassau and the State of New Jersey.
5. The defendant, ABLN TRUCKING, at all times herein mentioned was and still is a partnership doing business in the County of Nassau and the State of New York.
6. The defendant, ABLN TRUCKING, at all times herein mentioned was and still is a limited liability partnership doing business in the County of Nassau and the State of New York.
7. The defendant, ABLN TRUCKING, at all times herein mentioned was and still is a limited liability corporation doing business in the County of Nassau and the State of New York.
8. The defendant, ABLN TRUCKING, at all times herein mentioned was and still is a sole proprietorship doing business in the County of Nassau and the State of New York.

9. At all times herein mentioned, defendant ABLN TRUCKING transacted business within the State of New York.

10. At all times herein mentioned, defendant ABLN TRUCKING derived substantial revenue from goods used or consumed or services rendered in the State of New York.

11. At all times herein mentioned, defendant ABLN TRUCKING expected or should reasonably have expected its acts to have consequences in the State of New York.

12. At all times herein mentioned, defendant ABLN TRUCKING derived substantial revenue from interstate or international commerce.

13. The defendant, NELSON E. PERDOMO, at all times herein mentioned was and still is a resident of the County of Union and the State of New Jersey.

14. On or about September 24, 2021, plaintiff CAMRON JAY ONEAL HENDRICKS was the operator of a certain motor vehicle, bearing New York license plate number HZT7660.

15. On or about September 24, 2021, defendant ABLN TRUCKING was the registered owner of a certain motor vehicle, bearing New Jersey license plate number AU834R.

16. On or about September 24, 2021, defendant ABLN TRUCKING was the titled owner of a certain motor vehicle, bearing New Jersey license plate number AU834R.

17. On or about September 24, 2021, defendant ABLN TRUCKING was the lessee of a certain motor vehicle, bearing New Jersey license plate number AU834R.

18. On or about September 24, 2021, defendant ABLN TRUCKING was the lessor of a certain motor vehicle, bearing New Jersey license plate number AU834R.

19. On or about September 24, 2021, defendant ABLN TRUCKING maintained a certain motor vehicle, bearing New Jersey license plate number AU834R.

20. On or about September 24, 2021, defendant ABLN TRUCKING controlled a certain motor vehicle, bearing New Jersey license plate number AU834R.

21. On or about September 24, 2021, defendant NELSON E. PERDOMO was the

operator of a certain motor vehicle, bearing New Jersey license plate number AU834R.

22. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the express knowledge of its owner.

23. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the implied knowledge of its owner.

24. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the express consent of its owner.

25. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the implied consent of its owner.

26. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the express permission of its owner.

27. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the implied permission of its owner.

27. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO under the scope of employment and/or on the business of its owner.

28. On or about September 24, 2021, the motor vehicle bearing New Jersey license plate number AU834R was being operated by defendant NELSON E. PERDOMO with the express knowledge, consent and/or on the business of its owner.

29. On or about September 24, 2021, the roadway of State Street New Cassel at or near its intersection with Summa Avenue, County of Nassau, City and State of New York was a public roadway, street and/or thoroughfare.

30. On or about September 24, 2021, the vehicle operated by the defendant NELSON E. PERDOMO came in contact with the vehicle operated by the plaintiff CAMRON JAY ONEAL HENDRICKS, at the aforementioned location.

31. Solely as a result of the defendants' negligence, carelessness and recklessness the plaintiff was caused to suffer severe and serious personal injuries to mind and body, and further, that the plaintiff was subjected to great physical pain and mental anguish.

32. The aforesaid occurrence was caused by the negligence of the defendants, without any culpable conduct on the part of the plaintiff.

33. As a result of the foregoing, the plaintiff sustained serious personal injuries as defined in Section 5102(d) of the Insurance Law of the State of New York, and/or economic loss greater than basic economic loss as defined in Section 5102(a) of the Insurance Law of the State of New York.

34. This action falls within one or more of the exceptions set forth in Section 1602 of the Civil Practice Law and Rules.

35. Due to defendants' negligence, plaintiff is entitled to damages in a monetary sum which exceeds the jurisdictional limit of all lower Courts which would otherwise have jurisdiction.

WHEREFORE, the plaintiff demands judgment awarding damages in a monetary sum which exceeds the jurisdictional limit of all lower Courts which would otherwise have jurisdiction, together with interest and the costs and disbursements of this action, and such other and further relief as to this Court seems just and proper.

FILED: BRONX COUNTY CLERK 05/10/2022 04:12 PM

INDEX NO. 807160/2022E

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 05/10/2022

Dated: Forest Hills, New York
May 6, 2022



By: Alla Krupnik
KRUPNIK LAW GROUP, P.C.
Attorneys for Plaintiff
108-18 Queens Blvd., Suite 704
Forest Hills, New York 11375
(718) 532-4400

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

CAMRON JAY ONEAL HENDRICKS,
Plaintiff,

-against-

NELSON E. PERDOMO and ABLN TRUCKING,
Defendants.

INDEX NO.

**ATTORNEY'S
VERIFICATION**

Alla Krupnik, an attorney duly admitted to practice law in the State of New York, makes the following affirmation under the penalty of perjury:

I am of the firm of KRUPNIK LAW GROUP, P.C., the attorneys of record for the plaintiff.

I have read the foregoing Complaint and know the contents thereof; the same is true to my own knowledge except as to the matters therein stated to be alleged on information and belief and that as to those matters, I believe them to be true.

This verification is made by affirmant and not by plaintiff because he is not in the County of Queens, which is the County where your affirmant maintains offices.

The grounds of affirmant's belief as to all matters not stated upon affirmant's knowledge are correspondence had with the said plaintiff, information contained in the said plaintiff's file, which is in affirmant's possession, and other pertinent data relating thereto.

Dated: Forest Hills, New York
May 6, 2022



ALLA KRUPNIK

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

Index No.

=====

CAMRON JAY ONEAL HENDRICKS,

Plaintiff,

-against-

NELSON E. PERDOMO and ABLN TRUCKING,

Defendants.

=====

SUMMONS and VERIFIED COMPLAINT

=====

KRUPNIK LAW GROUP, P.C.

Attorneys for Plaintiff

Office and Post Office Address and Telephone

108-18 Queens Blvd., Suite 704

Forest Hills, New York 11375

(718) 532-4400

=====

Service of a copy of the within SUMMONS and VERIFIED COMPLAINT is hereby admitted.

Dated, _____

.....

Attorney(s) for

=====

Please take notice

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of _____
duly entered in the office of the clerk of the within named court on

☐ NOTICE OF SETTLEMENT

that _____, of which the within is a true copy will be presented for
settlement to the HON. _____, one of the judges of the

within named court, at 851 Grand Concourse, Bronx, New York on _____

Dated: Forest Hills, New York

May 6, 2022

Yours, etc.,

KRUPNIK LAW GROUP, P.C.

Attorneys for Plaintiff



P6715486

CAMRON JAY ONEAL HENDRICKS
PLAINTIFF
- vs -
NELSON E. PERDOMO, ET AL
DEFENDANT

SUPREME COURT BRONX COUNTY
STATE OF NEW YORK
Docket No. 807160/2022E

Person to be Served
ABLN TRUCKING
121 JAQUES STREET
ELIZABETH NJ 07201

AFFIDAVIT OF SERVICE
(For Use By Private Service)

Papers Served: ATTORNEY'S VERIFICATION, SUMMONS AND VERIFIED COMPLAINT

Service Data:

Served Successfully ☒ Not Served _____ Date: 05/13/2022 Time: 9:10AM Attempts: _____

_____ Delivered a copy to him/her personally

Name of person served and relationship / title:

Julitza Plata

_____ Left a copy with a competent household member of over 14 years of age residing therein.

CLERK AUTHORIZED TO ACCEPT

☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

Description of Person Accepting Service:

SEX: **FEMALE** COLOR: **TAN** HAIR: **BROWN/BLONDE**
OTHER: **Glasses**

APP.AGE: **40** APP. HT: **5'5** APP. WT: **180**

Comments Or Remarks:

Sworn to before me this
18TH day of MAY, 2022

FINA GIORDANO
FINA GIORDANO
Notary Public, State of New Jersey
No. 2428940
Qualified in
Commission Expires 01/17/2023

I, DARLEEN DOMIZIO, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Darleen Domizio

Signature of Process Server

Date

Client File Number:

Lexitas
219 South Street STE 102
New Providence, NJ 07974
908-897-0273
KRUPNIK LAW GROUP, PC

Index No. 807160/2022E

SUPREME COURT BRONX COUNTY STATE OF NEW YORK

=====

CAMRON JAY ONEAL HENDRICKS

PLAINTIFF

- against -

NELSON E. PERDOMO, ET AL

DEFENDANT

=====

ATTORNEY'S VERIFICATION, SUMMONS AND VERIFIED COMPLAINT

=====

KRUPNIK LAW GROUP, PC

108-18 QUEENS BLVD, SUITE 704

QUEENS, NY 11375

718 532-4400

NJSUBCOURT - SUITABLE AT BUSINESS



P6715478

KRUPNIK LAW GROUP, PC SOLOMON ISAAC
SUPREME COURT BRONX COUNTY STATE OF NEW YORK

CAMRON JAY ONEAL HENDRICKS

PLAINTIFF

- vs -

NELSON E. PERDOMO, ET AL

DEFENDANT

index No. 807160/2022E

Date Filed

Office No.

Court Date.

STATE OF NEW JERSEY, COUNTY OF UNION :SS:

DARLEEN DOMIZIO being duly sworn, deposes and says; I am over 18 years of age, not a party to this action, and reside in the State of New Jersey. That on the 13TH day of MAY, 2022 9:10AM at 121 JAKES STREET ELIZABETH NJ 07201

I served the ATTORNEY'S VERIFICATION, SUMMONS AND VERIFIED COMPLAINT upon NELSON E. PERDOMO

the DEFENDANT therein named by delivering and leaving a true copy or copies of the aforementioned documents with Julitza Plata, WIFE a person of suitable age and discretion.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of the service as follows.

SEX: FEMALE COLOR: TAN HAIR: BROWN/BLONDE

APP.AGE: 40 APP. HT: 5'5 APP. WT: 180

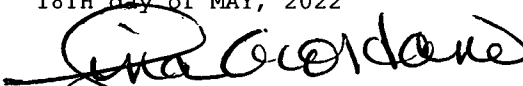
OTHER IDENTIFYING FEATURES


Glasses, MARRIED AND NOT IN MILITARY

On 05/18/2022 I deposited in the United States mail another true copy of the aforementioned documents properly enclosed and sealed in a post-paid wrapper addressed to the said DEFENDANT at the above address. That being upon information and belief, the usual place of abode, last known residence of the DEFENDANT.

Copy mailed 1st class mail marked personal and confidential not indicating on the outside thereof by return address or otherwise that said notice is from an attorney or concerns an action against the person to be served.

Sworn to before me this
18TH day of MAY, 2022


TINA GIORDANO
Notary Public, State of New Jersey
No. 2428940
Qualified in
Commission Expires 01/17/2023


DARLEEN DOMIZIO
Lexitas
219 South Street, STE 102
New Providence, NJ 07974
908-897-0273
Client File Number:
KRUPNIK LAW GROUP, PC

Index No. 807160/2022E

SUPREME COURT BRONX COUNTY STATE OF NEW YORK

=====

CAMRON JAY ONEAL HENDRICKS

PLAINTIFF

- against -

NELSON E. PERDOMO, ET AL

DEFENDANT

=====

ATTORNEY'S VERIFICATION, SUMMONS AND VERIFIED COMPLAINT

=====

KRUPNIK LAW GROUP, PC

108-18 QUEENS BLVD, SUITE 704

QUEENS, NY 11375

718 532-4400